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March 29, 2011

Ms. Marlene H. Dortch
Secretary
445 12th Street, SW
Federal Communications Commission
Washington, DC 20554

Re: *Ex Parte* Presentation of HyperCube Telecom, LLC –
WC Dkts. 10-90, 07-135, 05-337; GN Dkt. 09-51; and CC Dkt. 01-92

Dear Ms. Dortch:

On March 28, 2011, Robert W. McCausland, Senior Vice President, Regulatory and Government Affairs, HyperCube Telecom, LLC ("HyperCube"); Doug Davis, Chief Technology Officer, HyperCube; and Helen E. Disenhaus, Lampert, O'Connor & Johnston, P.C., met with the following representatives of the Wireline Competition Bureau: Randolph Clarke, Lynne H. Engledow, Victoria A. Goldberg, Albert Lewis, Travis E. Litman, and Douglas L. Slotten. Also in attendance were Kevin B. King and Rohit Dixit from the Office of Strategic Planning and Policy Analysis. The attached written presentation was discussed at the meeting.

During the meeting, the HyperCube representatives described the nature of the services offered by HyperCube, a competitive tandem switching service provider. In particular, the HyperCube network is designed to allow seamless call transport and completion regardless of the platforms and protocols (both IP and TDM) used by originating and terminating providers and to provide customized solutions and alternatives to legacy network tandems. HyperCube representatives also described the manner in which the company is able to supplement as appropriate call information provided to it by originating providers, including populating the various information parameters, such as the Jurisdiction Information Parameter ("JIP"), in accordance with ATIS recommendations. The representatives noted that use of the JIP is now established in the TDM ecosystem, and that use of the JIP is emerging into the IP ecosystem. Furthermore, the use of JIP minimizes phantom traffic issues and also allows for public safety solutions, such as proper routing of poison control calls originating on wireless networks. The participants also discussed the role of intermediate carriers, LCRs, and arbitrage in addressing call blocking and incomplete call issues. Finally, the HyperCube representatives discussed the difference between end-user traffic stimulation and revenue-sharing used for marketing purposes by wholesale carriers.

Should there be any questions concerning this matter, please contact this office.

Very truly yours,

Helen E. Disenhaus

Helen E. Disenhaus

Counsel for HyperCube Telecom, LLC

Enclosure

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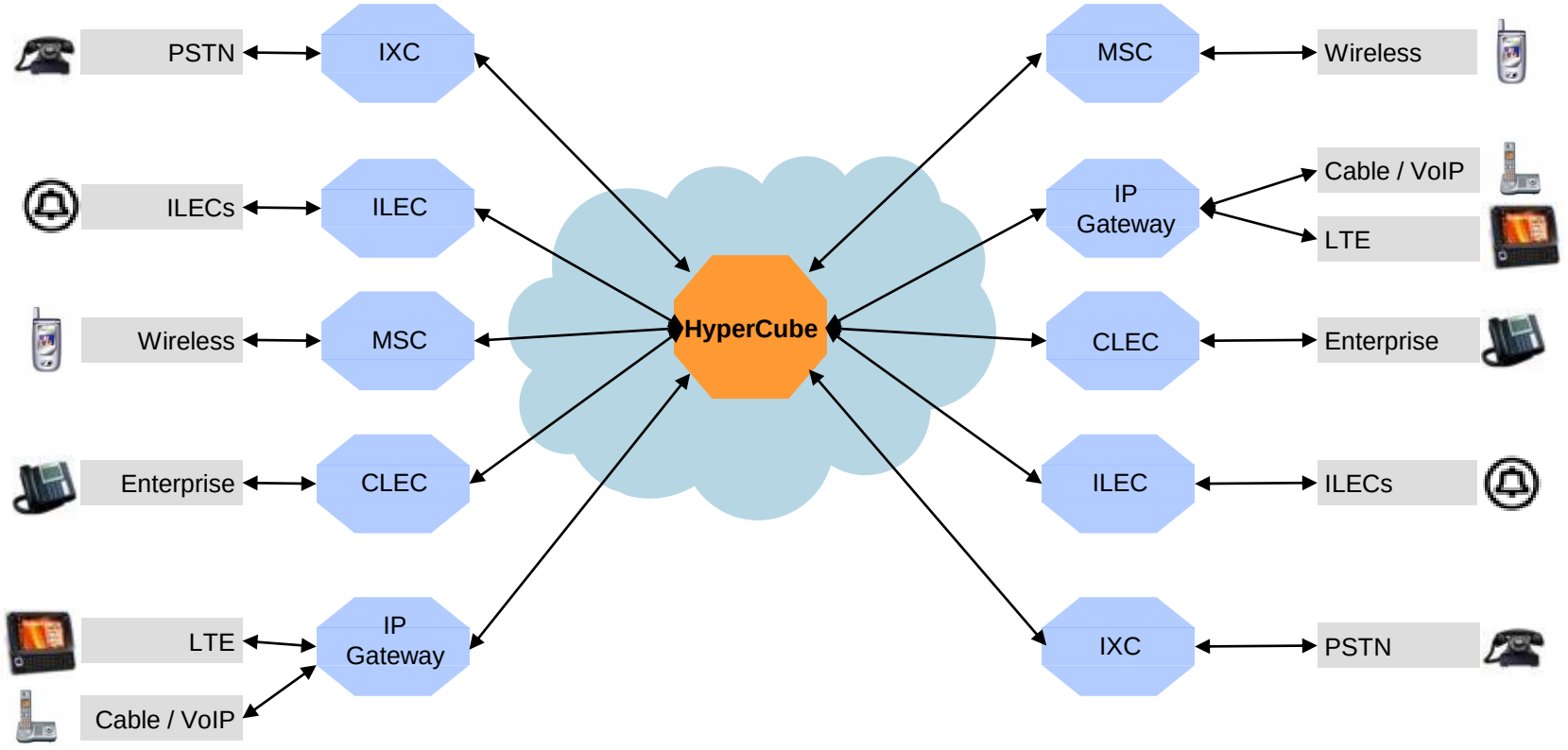
Mr. Robert W. McCausland
Mr. Doug Davis

HyperCube
TRUSTED SOLUTIONS FOR CONVERGING MARKETS

Bridging the Networks of Providers of Every Type

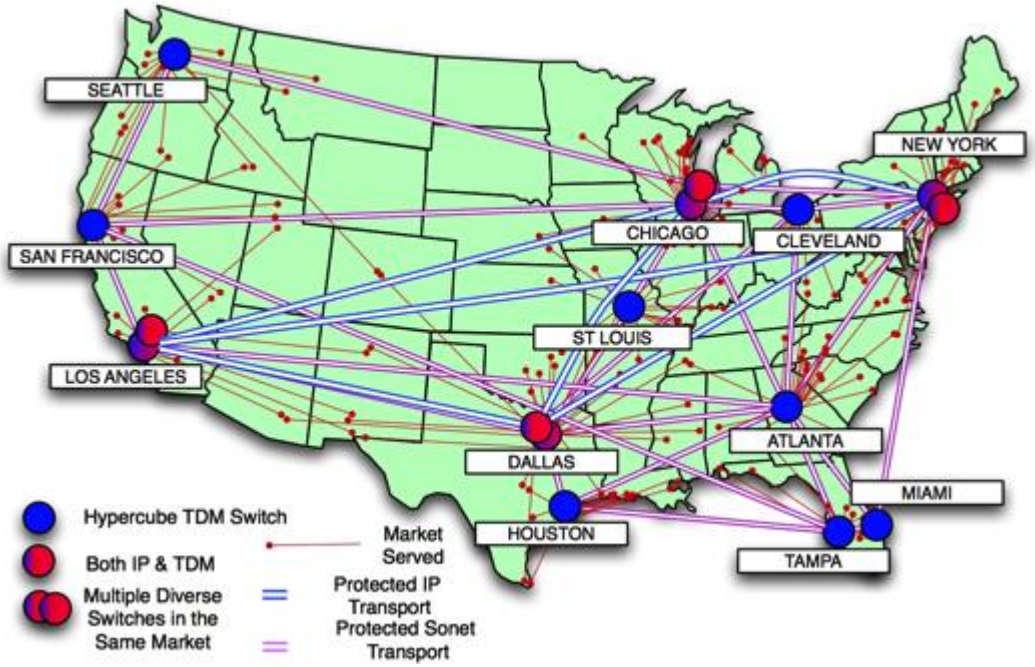
Hypercube enables the interconnection of all types of telecommunications providers and their networks, from traditional TDM to next generation of intelligent and packet networks.



HyperCube
TRUSTED SOLUTIONS FOR CONVERGING MARKETS

Platform Capable of Switching Calls of TDM and IP Formats

Through direct network interconnections, HyperCube has the capability of customizing the handling and delivery of calls based on originating and terminating providers' choices. HyperCube also has the ability to transform the calls received into the protocol required by the terminating provider.



- TDM and IP network capable of transporting any type of traffic while maintaining routing, jurisdiction and critical call information intact to the destination.
- Operates optical backbone between all switches and reaches most destinations utilizing an optical transport system.
- Provides real-time traffic analysis and visibility to carriers using a web-based application. For many carriers, it is their first analysis of certain types of traffic leaving their networks.
- Optical IP and TDM backbones, Multiple Internet connections
- Switch diversity in multiple markets to support customers and network.
- Diverse SS7 interconnections to Hypercube switches.
- Network is organized for total cost and traffic inter-exchange efficiency.
- Network composed of many switches and multiple transport systems, Yet calls are treated and rated as if they were carried in the optimal path.

HyperCube
TRUSTED SOLUTIONS FOR CONVERGING MARKETS

Seamless Solution for All Provider and Call Types

HyperCube is an enabler of the emerging-provider market, and provides a seamless solution to both IP and TDM providers.

Competitive Tandem Switching

- PSTN Interconnection
- Switch-to-Switch Interconnection
- Enhances Seamlessness, Diversity and Ubiquity of the Nation's Telecom Infrastructure

Comprehensive U.S. Coverage

- 18 Switches
- Geographically Diverse
- Proximate to Providers' Networks

Protocol/Technology Agnostic

- Helps Providers Seamlessly Make the Transition to IP Telephony
- Traffic Protocol and Traffic Type Agnostic

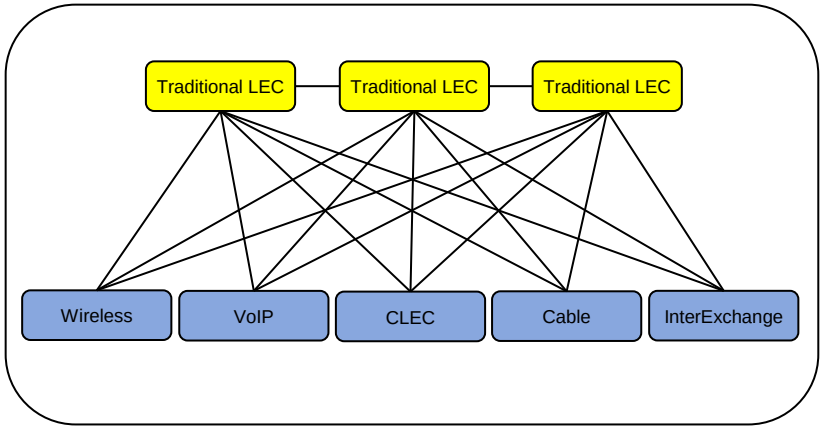
Flexible and Robust Network

- Enables Negotiated Commercial Solutions

Helping Providers Focus on Serving Their Customers, Not on Building Networks

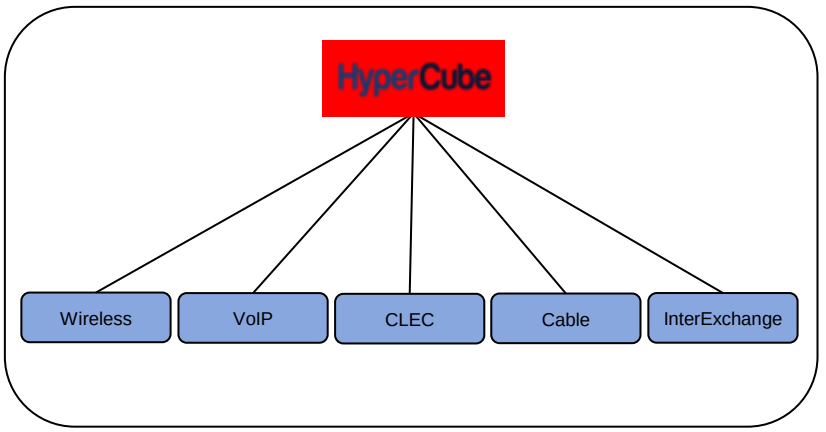
HyperCube does not burden providers with unnecessary network construction or multiple interconnections. HyperCube's goal is to help traditional and emerging providers focus on their core objectives to serve their customers.

Traditional Networks



- Traditional networks are designed to serve their own users, not other providers.
- Requires numerous complex connections within a LATA.
- Interconnection governed by traditional network constraints and capabilities.

HyperCube's Network



- Tandem services to enable traditional and emerging providers.
- Single HyperCube interconnection per market.
- Collaborative interconnection plan through negotiated commercial agreements. The market determines what our services are worth.

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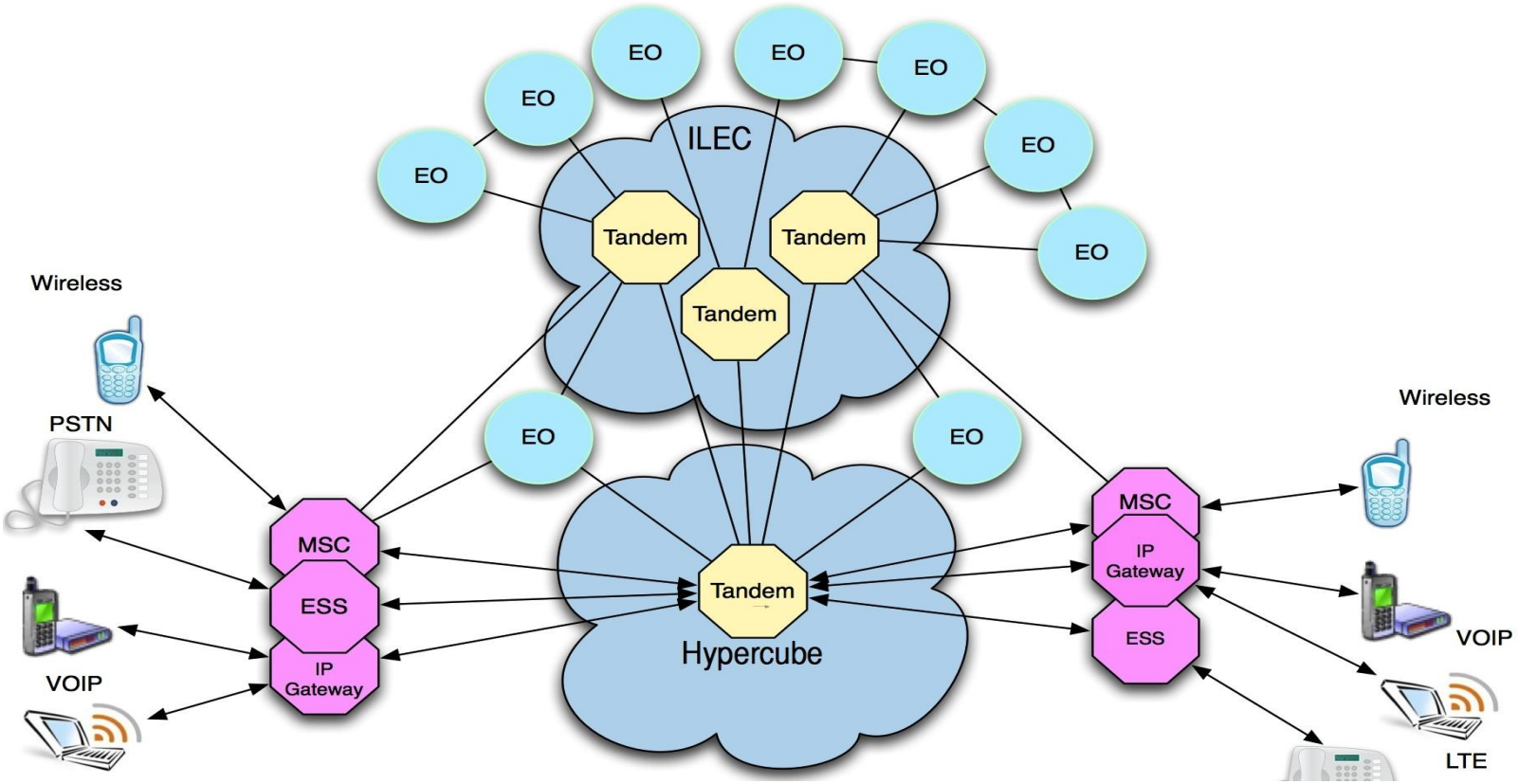
"Tandem Elect" – A Competitive Solution for IP Interconnection

HyperCube provides a competitive solution for IP interconnection that wouldn't exist without intermediate providers.



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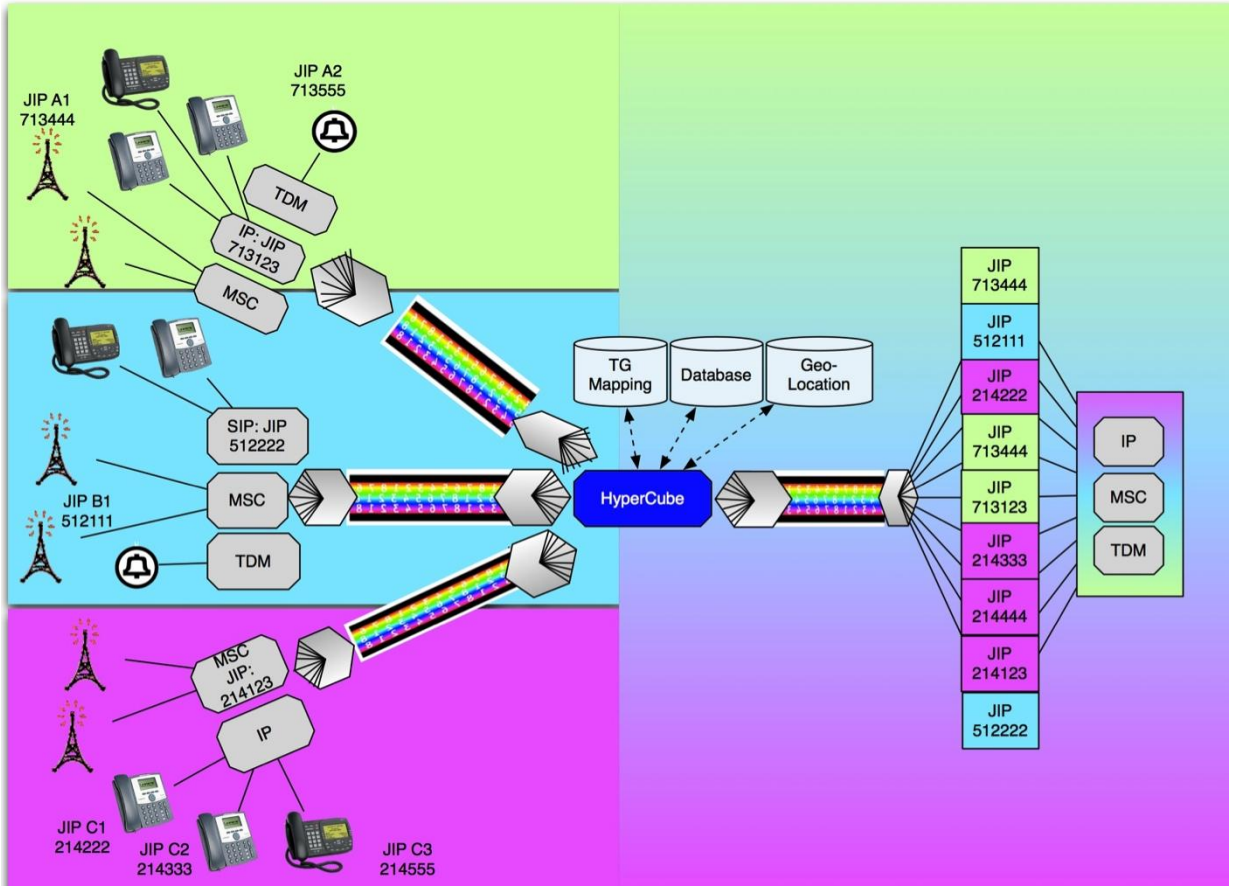
"Ghost Busting" – Innovative Solutions to Address Phantom Traffic Issues

- Innovative process developed to handle emergency service issues (e.g., poison control within wireless networks).

- HyperCube uses a combination of functions including SS7, TG mapping, database lookups and IP Geo-location to properly identify the origin of the call and apply JIP (or other network information) pursuant to ATIS-300011.

- As Hypercube deployed IP-based communications services, the above functions have been expanded into services provided to wireless, cable, VoIP and other emerging providers' networks when their equipment or design may not have readily facilitated such compliance.



Intermediate-Provider Solutions That Traverse Technologies and Provider Types

This Rulemaking is Key

Addressing Phantom Traffic

- **Solutions largely exist within industry practices, but broad industry-wide adherence is necessary to eliminate the problem.**
- **The Commission should require specific actions, however, such actions do not need to be radical to be effective.**
- **In its Comments, HyperCube will propose specific solutions that work and that will not produce unreasonable burdens to providers.**

Preserving and Expanding the Seamless Transition to IP

- **By bridging emerging and traditional networks, and by translating calls to and from TDM and IP formats, HyperCube's cost-effective solutions benefit consumers and perform an important role in the nation's transition to IP.**
- **The new rules must encourage and facilitate the growth of effective competitive alternatives for IP and for middle-mile switching.**

Intermediate-Provider Solutions That Traverse Technologies and Provider Types

This Rulemaking is Key (continued)

Revenue Sharing:

- **Should be distinguished from access stimulation.**
- **Is a marketing tool that encourages the use of innovative competitive alternatives such as those provided by HyperCube and as such does not influence end user calling patterns.**
- **Access stimulation by design alters end-user dialing patterns. This happens with and without revenue sharing where benchmark rates are inapplicable.**
- **Revenue sharing strategies are commonplace in a capitalistic system and are benign.**
- **No Commission action to restrict revenue sharing is appropriate or necessary as a solution to access stimulation.**

New Rules and Definitions:

- **Must be accurate and precise to be effective.**
- **Refinements to the Commission's proposals to address phantom traffic and access stimulation are necessary and will be proposed in detail in HyperCube's pending comments.**